



GEORGIA M. PESTANA  
Corporation Counsel

THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NY 10007

CHRISTOPHER G. ARKO  
Senior Counsel  
(212) 356-5044  
(212) 356-3509 (fax)  
carko@law.nyc.gov

December 16, 2021

**By ECF**

Hon. John P. Cronan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Juel Roundtree v. City of New York, et al., 15 Civ. 8198 (JPC)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department newly assigned to the defense of this matter. I write to respectfully request an extension of time to February 25, 2022 to file defendants' anticipated motion for summary judgment. This is defendants' first request for an extension to file their summary judgment motion. There does not appear to be a current telephone number for plaintiff on the docket at which he could be reached to ask for his consent.

The reason for this request is that I recently took this matter over from former Assistant Corporation Counsel Stefano Perez and am still getting up to speed on the facts and procedural history. I apologize to the Court but in all candor I cannot move by the Court's deadline of January 7, 2022. I will be out of the office on a previously-scheduled vacation from December 23, 2020 through January 2, 2022. I also have a motion for summary judgment due in the Eastern District and an opposition to a motion to amend due in the Southern District on January 7, 2022. Furthermore, I have a trial scheduled to commence before District Judge Schofield on January 24, 2022 and another trial scheduled to commence before District Judge Oetken on February 7, 2022. Accordingly I would be extremely hard-pressed to file the summary judgment motion in this matter by January 7, 2022. I therefore respectfully request Your Honor's understanding and ask that the Court grant an extension of time to February 25, 2022 to file defendants' motion, and that plaintiff's opposition be due by March 25, 2022, and defendants' reply be due by April 1, 2022.

I thank the Court for its consideration herein.

The request is granted. Defendants shall move by February 25, 2022, Plaintiff shall oppose by March 25, 2022, and Defendants shall reply by April 1, 2022. The Clerk of Court is respectfully directed to mail this order to the *pro se* Plaintiff. SO ORDERED.

Respectfully submitted,  
/s/ *Christopher G. Arko*  
Christopher G. Arko  
Senior Counsel

December 17, 2021  
New York, NY

  
JOHN P. CRONAN  
United States District Judge

cc: Juel Roundtree (by mail)  
*Plaintiff pro se*  
c/o Juel Roundtree (DHS Shelter)  
127 W. 25<sup>th</sup> Street  
Bed# 6-044  
New York, NY 10001